

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re	Chapter 11
FTX TRADING LTD., <i>et al.</i> ¹	Case No. 22-11068 (JTD)
Debtors.	(Jointly Administered)
ALAMEDA RESEARCH LLC, ALAMEDA RESEARCH LTD., FTX TRADING LTD., WEST REALM SHIRES, INC., and WEST REALM SHIRES SERVICES, INC.,	
Plaintiffs,	
-against-	Adv. Pro. No. 23-50145 (JTD)
FTX DIGITAL MARKETS LTD., BRIAN C. SIMMS, KEVIN G. CAMBRIDGE, and PETER GREAVES, and J. DOES 1-20	Re: Adv. Docket Nos. 1 & 3
Defendants.	

**STIPULATION BETWEEN THE PARTIES
TO EXTEND THE JPL DEFENDANTS' DEADLINE TO
ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

This stipulation (the “**Stipulation**”) is entered into by and between Alameda Research LLC, Alameda Research Ltd., FTX Trading Ltd., West Realm Shires, Inc., and West Realm Shires Services, Inc. (the “**Plaintiffs**”), and FTX Digital Markets, Ltd. (“**Digital**”), Brian C. Simms KC, Kevin G. Cambridge, and Peter Greaves, the Joint Provisional Liquidators and Foreign Representatives of Digital (the “**JPLs**” and, together with Digital, the “**JPL Defendants**,” and together with the Plaintiffs, the “**Parties**”):

¹ The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the debtors (the “**U.S. Debtors**”) and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the U.S. Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

WHEREAS, on March 19, 2023, the Plaintiffs commenced the above-captioned adversary proceeding (the “**Adversary Proceeding**”), pending in the United States Bankruptcy Court for the District of Delaware (the “**Court**”), by filing the *Complaint by Alameda Research LLC, Alameda Research Ltd., FTX Trading Limited, West Realm Shires, Inc., West Realm Shires Services, Inc. against FTX Digital Markets Ltd, Brian C. Simms, Kevin G. Cambridge, Peter Greaves and J. Does 1-20* [Adv. Docket No. 1] (the “**Complaint**”);

WHEREAS, on March 24, 2023, the Clerk of the Court issued a summons [Adv. Docket No. 3] in the Adversary Proceeding, which set the deadline to respond to the Complaint as April 23, 2023, and scheduled a pre-trial conference for May 17, 2023, at 1:00 p.m. (ET) (the “**Pretrial Conference**”);

WHEREAS, the Parties intend to file a proposed scheduling order (the “**Scheduling Order**”) in advance of the Pretrial Conference in accordance with rule 7016-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”) and the applicable chambers procedures for the Honorable John T. Dorsey; and

WHEREAS, the Parties have agreed to extend the time for the JPL Defendants to answer or otherwise respond to the Complaint through and including May 8, 2023.

THEREFORE, in consideration of the foregoing, the Parties stipulate and agree that:

1. The above recitals are incorporated and made a part of this Stipulation.
2. The JPL Defendants shall have through and including May 8, 2023 to answer or otherwise respond to the Complaint. Unless otherwise agreed to by the Parties or ordered by the Court, all subsequent pleadings, motions, or other papers shall be filed in accordance with the

applicable deadlines set forth in the Federal Rules of Bankruptcy Procedure, the Local Rules, the Scheduling Order, and/or any other order of the Court.

3. The undersigned counsel hereby represent and warrant that they have full authority to execute this Stipulation on behalf of the respective Parties and that the respective Parties have full knowledge of and have consented to this Stipulation.

4. All rights, claims and defenses of the Parties are fully preserved.

Dated: April 21, 2023
Wilmington, Delaware

/s/ Matthew B. McGuire
LANDIS RATH & COBB LLP
Adam G. Landis (No. 3407)
Matthew B. McGuire (No. 4366)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Email: landis@lrclaw.com
mcguire@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP
Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

Counsel for the Plaintiffs

/s/ Brendan J. Schlauch
RICHARDS, LAYTON & FINGER, P.A.
Kevin Gross (No. 209)
Paul N. Heath (No. 3704)
Brendan J. Schlauch (No. 6115)
David T. Queroli (No. 6318)
One Rodney Square
920 N. King Street
Wilmington, DE 19801
Telephone: (302) 651-7700
gross@rlf.com
heath@rlf.com
schlauch@rlf.com
queroli@rlf.com

—and—

WHITE & CASE LLP
Jessica C. Lauria (admitted *pro hac vice*)
J. Christopher Shore (admitted *pro hac vice*)
Brian D. Pfeiffer (admitted *pro hac vice*)
Mark Franke (admitted *pro hac vice*)
Brett L. Bakemeyer (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200
jessica.lauria@whitecase.com
cshore@whitecase.com
brian.pfeiffer@whitecase.com
mark.franke@whitecase.com
brett.bakemeyer@whitecase.com

Thomas E Lauria (admitted *pro hac vice*)
Richard S. Kebrdle (admitted *pro hac vice*)
200 South Biscayne Boulevard, Suite 4900
Miami, FL 33131
Telephone: (305) 371-2700
tlauria@whitecase.com
rkebrdle@whitecase.com

Counsel for the JPL Defendants